

REMARKS

Claims 1, 3-12, and 14-33 are pending in the application. Claim 32 is amended to further recite features of the invention. No new matter is added. Support for the amendments to claim 32 may be found in paragraphs 0035-0037 of the published patent application. Reconsideration of the outstanding rejections in the present application are requested based on the following remarks.¹

A. The Rejection of Claims 1, 3-12, 14-20, and 24-33 under 35 U.S.C. §103(a)

Claims 1, 3-12, 14-20, and 24-33 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 7,137,006 to Grandcolas *et al.* ("Grandcolas") in view of U.S. Patent 5,987,454 to Hobbs. This rejection is respectfully traversed.

Applicant submits that the Office Action fails to establish a *prima facie* case of obviousness. As recited in Section 2142 of the MPEP, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 2 USPQ2d

¹ As Applicant's remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicant's silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., assertions regarding dependent claims, whether a reference constitutes prior art, whether references are legally combinable for obviousness purposes) is not a concession by Applicant that such assertions are accurate or such requirements have been met, and Applicant reserves the right to analyze and dispute such in the future.

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1438 (Fed. Cir. 1991).

Applicant submits that the Office Action fails to establish the requisite prima facie case.

The Office Action, page 3, lines 6-10, asserts that Grandcolas teaches:

a validation module operatively linked to the universal session manager through an electronic network; such that the universal session manager retrieves validation information from the validation database in order to validate a customer (i.e., constructing an authentication token comprising profile data associated with the user, see col. 2 lines 51-53, also see col. 4 lines 30-40);

In particular, Grandcolas teaches the utilization of a token that is forwarded to the user. Further, in column 2, lines 47-60, Grandcolas teaches that the user is **redirected** to the second server. Applicant submits that such redirecting of the user, and use of a token, as performed in the processing of Grandcolas, would not have led the one of ordinary skill in the art to modify such teachings based on Hobbs. By redirecting the user, the user is by definition no longer on the site of the "first server" of Grandcolas. Accordingly, the proposed modification of Grandcolas with the teachings of Hobbs, so as to provide multiple frames (further discussed below) would so fundamentally change the teachings of Grandcolas, such that it would not have been obvious to do such modification.

Further, the motivation set forth in the Office Action is deficient, as set forth in the Office Action on page 4, lines 2-6. That is, the Office Action asserts:

Thus it would have been obvious to one of ordinary skill in the art to combine the teachings of Grandcolas and Hobbs to allow users to seamlessly access their online accounts using a single login-ID.

However, such proffered motivation is not supported in that Grandcolas already teaches such a single sign in process, as is clearly acknowledged in the Office Action. That is, it would not have been obvious to modify Grandcolas based on motivation to include features, where Grandcolas already includes such features. To explain further, as was argued in Applicant's

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prior Response, since Grandcolas already discloses a method and system for single sign-on access to multiple web servers, the motivation to combine the teachings of Grandcolas and Hobbs to provide such is inappropriate. Applicant submits that such argument is not addressed in the pending Office Action.

In Applicant's prior response, Applicant provided various remarks regarding the deficiencies of Grandcolas and Hobbs as to the claimed consolidated home page. For the reasons set forth therein, Applicant submits that the applied art fails to teach each and every feature of the claimed invention, including the claimed consolidated home page.

However, Applicant respectfully submits that the basis of the rejection is not clearly set forth, so as to inhibit Applicant's analysis of the merits of the rejection. Specifically, the basis of the rejection is unclear for the reasons set forth below.

In particular, the Office Action (e.g. page 10, line 16) asserts that Grandcolas teaches the claimed consolidated home page. However, the Office Action then appears to reflect a deficiency in the teachings of the consolidated home page, in that the Office Action also relies on an alleged consolidated home page of Hobbs, (e.g. on page 11, line 8). Thus, it is unclear what teachings the Office Action is relying on in such assertions.

Relatedly, as was noted in the prior Response, claim 1 does not simply set forth the general concept of using a first frame and a second frame. Rather, claim 1 of the present application sets forth various particulars of such displayed frames, e.g., "providing links to the accounts in a first frame of the interface" and "provides access to the remote server, by hosting the remote server in a second frame of the interface." Hand in hand with such features, claim 1 recites an interrelationship of such utilization of multiple frames vis-à-vis the processing of the universal session manager and the validation module.

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Clarification of the rejection is requested.

Further, Applicant maintains the traversal of the Office Action's assertions regarding "HTML frames". Grandcolas does not recite "HTML" or "frames" in the patent outside of "HTML" being recited with respect to a reference on page 2 of the patent. However, the Office Action asserts that "the consolidated homepage including a first frame and a second frame (Although this limitation is not explicitly disclosed by Grandcolas, however, "HTML frame" is nothing but a way to allow authors to present documents in multiple views, which may be independent windows or subwindows," and that multiple views offer designers a way to keep certain information visible, while other views are scrolled or replaced. The Office Action makes similar assertions on page 6 and 11 of the Office Action. However, Applicant submits that the meaning of the assertion is not apparent. That is, it does not appear that the rejection relies on such assertion, but rather that the assertion is peripheral to the rejection. Clarification of the manner in which such assertion is relied upon is requested.

For at least these above reasons, claim 1 is not taught or suggested by the applied art. Applicant submits that claim 12 is allowable for similar reasons. The dependent claims are allowable at least for the reasons set forth above, as well as for the additional features such dependent claims recite.

Withdrawal of the rejection under 35 U.S.C. 103 is requested.

B. The Rejection of Claims 21-24 under 35 U.S.C. §103

Claims 21-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Grandcolas in view Hobbs, as applied to claim 12 above, and further in view of U.S. Patent 5,815,665 to Teper *et al.* ("Teper").

Since claims 21-24 are dependent on allowable independent claim 12, and since Teper

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does not cure the deficiencies of the combination of Grandcolas and Hobbs, claims 21-24 are allowable as well. Therefore, the undersigned representative will not address the arguments with respect to these claims and reserves the right to address these arguments at a later time.

Withdrawal of the rejection of claims 21-24 is requested.

C. Conclusion

The foregoing is submitted as a full and complete Response to the Office Action, and early and favorable consideration of the claims is requested. If the Examiner believes any informalities remain in the application which may be corrected by Examiner's Amendment, or if there are any other issues which may be resolved by telephone interview, a telephone call to the undersigned attorney at (703)714-7448 is respectfully solicited.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 50-0206, and please credit any excess fees to such deposit account.

Respectfully submitted,

Date: 9/8/2008

By:


James R. Miner
Registration No. 40,444

HUNTON & WILLIAMS LLP
1900 K Street, N.W.
Suite 1200
Washington, D.C. 20006-1109
Telephone: 202.955.1500
Facsimile: 202.778.2201

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